

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :  
  
-against- : 16 Cr. 760 (RMB)  
  
AHMAD KHAN RAHAMI, : REPLY AFFIRMATION  
a/k/a/ AHMAD RAHIMI  
  
Defendant. :

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SABRINA P. SHROFF, Esq., hereby affirms under penalties of perjury pursuant to Title 28 U.S.C. 1746:

1. I am a staff attorney with the Federal Defenders of New York, Inc., and trial counsel to Ahmad Khan Rahimi. I make this affirmation in further support of Mr. Rahimi's motion for a change of venue pursuant to the Fifth and Sixth Amendments of the Constitution, and Rule 21(a) of the Federal Rules of Criminal Procedure, as well as such other and further relief as the Court deems just and proper.

2. Attached as Exhibit 1 is a true and correct copy of the amended report and analysis prepared by the defendant's retained venue expert, Margaret Bull Kovera, et al., *United States v. Rahimi, 16-Cr-760 (RMB) Amended Pretrial Publicity Analysis*, dated April 24, 2017. The original report was filed on April 5, 2017 with Mr. Rahimi's opening brief in support of his motion for change of venue. The amended report is being filed to provide corrected data and analysis relating to the media coverage in this and the alternative jurisdictions, after I learned that a segment of

articles discussed in the original report was inadvertently characterized as being from the District of Vermont when the articles were in fact from another jurisdiction, and that another segment of articles from New York and District of Columbia publications were inadvertently omitted from the initial analysis.

3. Attached as Exhibit 2 is a true and correct copy of the Declaration of Margaret Bull Kovera, dated April 24, 2017.

4. Attached as Exhibit 3 is a true and correct copy of the article Editors, USA Today, *Unreported terror attacks? Here are more than 200 articles on USA TODAY covering White House's list*, Burlington Free Press, Feb. 7, 2017, <http://bfpne.ws/2o3R1CL>.

5. Attached as Exhibit 4 is a true and correct copy of the article Mike Kelly, *Kelly: Lack of evidence doomed Trump's travel ban*, Burlington Free Press, Feb. 10, 2017, <http://bfpne.ws/2omRdJH>.

6. Attached as Exhibit 5 is a true and correct copy of the article Tom Nobile, *Congressman bringing wounded Linden officer to Trump address*, Burlington Free Press, Feb. 28, 2017, <http://bfpne.ws/2pBMYgQ>.

7. Attached as Exhibit 6 is a true and correct copy of the article Susan Loyer, *Highland Park dad advocates for ACA, attends Trump's speech*, Burlington Free Press, Mar. 1, 2017, <http://bfpne.ws/2pRvyte>.

8. Attached hereto as Exhibit 7 is a true and correct copy of the article Kaja Whitehouse, *Alleged Chelsea bomber's lawyers try to move trial*, N.Y. Post, Jan. 31, 2017, <http://nyp.st/2jAbHLE>.

9. Attached as Exhibit 8 is a true and correct copy of the article Victoria Bekiempis, *Prosecutors in Chelsea bombing case eager to start trial*, N.Y. Daily News, Feb. 1, 2017, <http://nydn.us/2jXtvnq>.

10. Attached as Exhibit 9 is a true and correct copy of the article Reuters, *Judge Sets October Trial Date for Accused New York City Bomber*, N.Y. Times, Feb. 10, 2017, <https://www.nytimes.com/reuters/2017/02/10/world/asia/10reuters-usa-attacks-new-york.html>.

11. Attached as Exhibit 10 is a true and correct copy of the article AP, *Bombing suspect's lawyer wants shootout charges dropped*, Wall St. J., Feb. 15, 2017, <http://on.wsj.com/2pqsg3v>.

12. Attached as Exhibit 11 is a true and correct copy of the article Lia Eustachewich, *Chelsea bomb suspect wants attempted murder rap from police shootout dropped*, N.Y. Post, Feb. 15, 2017, <http://nyp.st/2kzoU7L>.

13. Attached as Exhibit 12 is a true and correct copy of the article Kaja Whitehouse, *Accused Chelsea bomber's lawyers want case moved out of state*, N.Y. Post, Mar. 2, 2017, <http://nyp.st/2ly00WY>.

14. Attached as Exhibit 13 is a true and correct copy of the article Benjamin Weiser, et al., *Preet Bharara Shunned Politics. His End Was Tinged by Them*, N.Y. Times, Mar. 12, 2017, <https://nyti.ms/2ne2IWR>.

15. Attached as Exhibit 14 is a true and correct copy of the article Associated Press, *APNewsBreak: FBI reviews handling of terrorism-related tips*, N.Y. Times, Apr. 8, 2017, <http://nyti.ms/2ophkyJ>.

Dated: New York, New York  
April 24, 2017

/s/ Sabrina P. Shroff  
SABRINA P. SHROFF